

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

CHAMBER OF COMMERCE OF
THE UNITED STATES OF
AMERICA; FORT WORTH
CHAMBER OF COMMERCE;
LONGVIEW CHAMBER OF
COMMERCE; AMERICAN
BANKERS ASSOCIATION;
CONSUMER BANKERS
ASSOCIATION; and TEXAS
ASSOCIATION OF BUSINESS,

Plaintiffs,

v.

Case No.: 4:24-cv-213-P

CONSUMER FINANCIAL PROTECTION
BUREAU; and ROHIT CHOPRA, in his
official capacity as Director of the Consumer
Financial Protection Bureau,

Defendants.

**DEFENDANTS' RENEWED MOTION TO TRANSFER UNDER 28 U.S.C. § 1404
AND MOTION TO DISMISS OR TRANSFER UNDER 28 U.S.C. § 1406**

Defendants the Consumer Financial Protection Bureau and Rohit Chopra (collectively, the Bureau) respectfully move to transfer this case to the United States District Court for the District of Columbia, or to dismiss the case entirely. As the Bureau explains in its accompanying brief, the Court should transfer this case under 28 U.S.C. § 1404 because Washington, D.C., is a better venue for resolving a dispute over a regulation promulgated in D.C. that directly affects only large credit card issuers—none of which are based in this Division or District—than the Fort Worth Division of the Northern District of Texas. In the alternative, the Court should dismiss or transfer this case

under 28 U.S.C. § 1406 because Plaintiffs have not established that venue is proper in this District in the first place.

DATED: May 28, 2024

Respectfully Submitted,

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General Counsel

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Chopra*

CERTIFICATE OF CONFERENCE

I hereby certify that on May 28, 2024, I communicated by email with counsel for Plaintiffs Michael Murray, who indicated that Plaintiffs oppose the motion to dismiss or transfer.

/s/ *Stephanie B. Garlock*
STEPHANIE B. GARLOCK

CERTIFICATE OF SERVICE

I hereby certify on May 28, 2024, a true and correct copy of this document was served electronically by the Court's CM/ECF system to all counsel of record.

/s/ *Stephanie B. Garlock*
STEPHANIE B. GARLOCK